



QBE Insurance Group

Inclusion of Diversity Policy

QBE Group Inclusion of Diversity Policy



Document Governance

Policy Reference: IDHR01

Accountable Executive: Group Executive, People & Culture

Document Owner: Group Head of Culture, Performance and Reward

Frequency of Review: Every two years

Approval Authority: Group Board People & Remuneration Committee

Approval Date: 06/10/2021

Effective Date: 01/01/2022

Status: FINAL

Key Points of Contact Yasmin Chiu
Chief Talent Officer
yasmin.chiu@qbe.com

Sophie Roberts
Group Culture & Inclusion Manager
sophie.roberts@qbe.com

Signed

Andrew Horton
Group Chief Executive Officer

Amanda Hughes
Group Chief People Officer

Contents

- Who it applies to** 4
- What we stand for and what we mean** 5
- It's who we are: Our DNA** 7
- How we fulfil our commitment** 8
- How we take action and measure success** 9
- How we ensure our legal compliance** 10

Who it applies to

This QBE Group Inclusion of Diversity Policy **sets our expectations** for creating a workplace culture in which all people, in all the ways we are different, feel included.

This means **everyone feels treated fairly, respectfully, valued, safe to speak up and inspired to do their best work.**

This policy also sets out QBE's aspirations to be a positive influence for the inclusion of diversity beyond the boundaries of the organisation. This policy explains why that's important to us and how we bring our aspirations to life.

The policy and the principles apply to everyone, regardless of our roles – employees, contractors (long or short term), contingent workers (including consultants), directors, agents, investors, our stakeholders and anyone else who represents QBE in any capacity. This policy also applies to any joint ventures where QBE has a controlling interest.

It sets out our expectations of how we interact with each other, in and out of the workplace and with our key stakeholders and partners.

To support the policy and to reflect QBE's commitment to inclusion of diversity, key areas have been identified to provide Group wide clarity and consistency. In these areas, Group policy sets global minimum standards, supported for some areas by local policies that address specific requirements and laws.

What we stand for

Inclusion of diversity enables us to live our purpose. It's who we are, it's part of our DNA.

People are at the heart of our business. At QBE, people are excited to bring their full selves to work. Creating a workplace culture and influencing the external environment so that our people, customers, suppliers and stakeholders feel included is essential to our success, now and into the future.

What we stand for sets our expectations for how we interact with each other, and our aspiration to be a positive influence for the inclusion of diversity beyond the boundaries of the organisation.

We fundamentally believe everyone should be included



We are all diverse and bring with us unique knowledge, skills, perspectives and ideas. We know that we achieve **better outcomes** when we are **truly inclusive**.

We create an inclusive environment where **it's always safe to speak up**. We are role models of inclusive behaviours and do not engage in, condone or ignore behaviour that is inappropriate. We know **the standard we walk past is the standard we accept**.

We play an active role as inclusive leaders. We are actively curious about others, courageous in thought and action, mindful of biases, and collaborate together to **ensure we all achieve our best**.

We strive to ensure QBE is an **equal opportunity employer** and respect all aspects of diversity.

We are **committed to respecting the rights of Indigenous people** in communities where we operate and to regularly reviewing our policies and practices to ensure their inclusion.

We know the inclusion of diversity is good for us now and in the future



We provide a great place to work that is safe, supportive of individual's needs and wellbeing, with equitable access to opportunities to learn, develop and grow because this ensures the **long-term sustainability of our business**.

We **attract, retain and develop the best people** for the best individual and organisational outcomes.

We **create diverse teams** to enhance creative problem-solving and effective decision-making, to **drive innovation, performance and better customer outcomes**.

We **treat all customers fairly** and **respectfully** at all times, acknowledging their individual diversity and needs.

We are positive role models for our communities



We are more than QBE. We work with our broader network of stakeholders to be a positive influence in the communities in which we operate. **We set the example to inspire others to follow**.

We seek to engage **suppliers and partners who share our commitment** to being inclusive of diversity. We expect our suppliers and partners to foster a diverse workforce, appropriate workplace behaviour and an inclusive culture.

We actively engage and support **the communities in which we live and work**.

What we mean

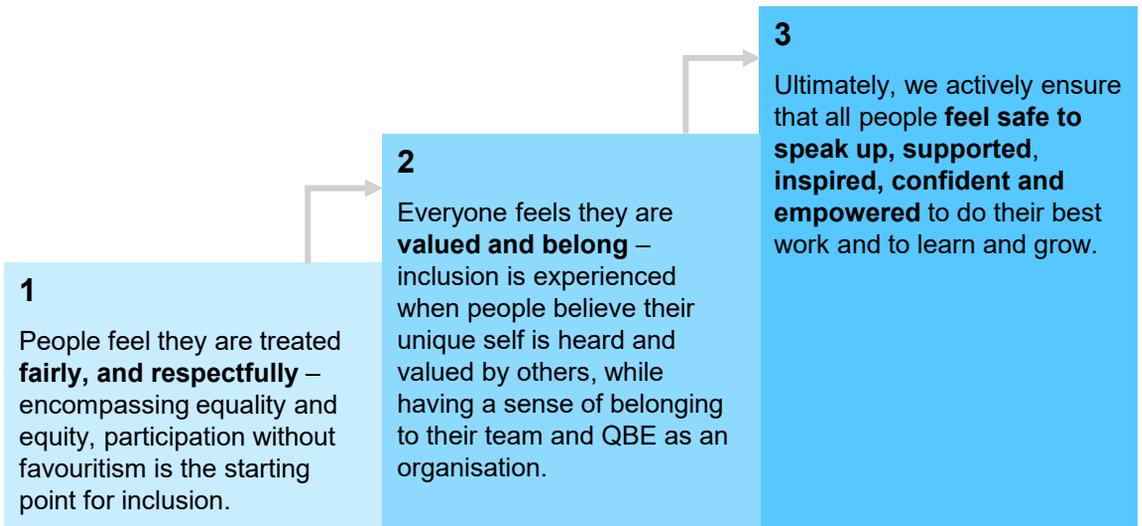
Inclusion of Diversity drives performance



Inclusion

We know that to realise the benefits of **all the ways we are different**, we have to create an environment where everyone is, and feels they are, included.

We define inclusion through three building steps:



The inclusion staircase



Diversity

At QBE, we have a broad view of diversity that includes all the ways all people are **visibly and invisibly different**.

This definition encompasses all **demographic characteristics** of diversity including gender and gender identity, race, age, disability, sexual orientation, religion or belief, marriage, pregnancy, and parental/caring responsibilities. At QBE, we extend this definition to go beneath what's visible to include all the **deeper ways we are diverse** including, values, experiences, perspectives, expertise, knowledge and ideas.



It's who we are: Our DNA

Our QBE DNA describes who we are, what we stand for and how we need to operate to fulfil our purpose. Inclusion of Diversity is at the core of enabling us to achieve our purpose and it's woven throughout the QBE DNA

Being curious to understand the unique needs of each customer to ensure we provide all our customers with great outcomes

Bringing together all our technical expertise in ways that build trust, support others, innovate and unlock new sources of value

Being inclusive of all the ways we are different enables us to reap the many rewards that result from feeling safe and inspired to be our true and best selves

Creating an environment where all people feel included is at the heart of enabling resilient and adaptable people and teams

we are
customer-focused
#OutsideIn

We proactively listen with empathy to guide how we meet customer needs and have an impact

we are
technical experts
#KnowYourStuff

We build and share our expertise, striving for excellence and knowing when to ask for guidance

we are
inclusive
#ValueAllViews

We treat each other with respect and fairness, and value diverse perspectives

we are
fast-paced
#RampItUp

We move with pace, adapting with our purpose and future in mind

we are
courageous
#DoTheRightThing

We act with integrity and challenge the status quo, feeling safe to speak up and experiment with new ideas

we are
accountable
#OwnItNow

We take ownership and follow through to deliver, managing risks and learning from mistakes

we are
a team
#Together

We support each other and collaborate widely to achieve common goals, knowing we are stronger together

Our QBE DNA



QBE DNA

Being open to new and different perspectives, to speak up, to make the right decisions are all easier when we feel included

Openness, transparency and creating an environment where we can experiment and learn from our mistakes happens when we start with the intent of ensuring everyone feels included

Sharing expertise and ideas, helping and supporting each other and being a united and collaborative team all require us to include each other and value our differences

How we fulfil our commitment

Highest level of oversight

Group Board
People &
Remuneration
Committee

Appointed by the Group Board, the Committee has the scope of responsibilities including monitoring the progress, impact and effectiveness of the Inclusion of Diversity strategy, policy and practices.

Statutory and regulatory reporting and disclosure requirements are also the responsibility of the Committee and include the ASX Corporate Governance Council's Principles, Women's Empowerment Principles and other reporting requirements.

Accountability for Inclusion of Diversity

Group
Executive
Committee

The Group Executive Committee (chaired by the Group CEO) represents the Global Inclusion of Diversity perspective, and is supported by the Group Head of Culture, Performance and Reward, and a Global Community of Practice. The Committee is accountable for:

- Endorsing and actively supporting the global inclusion of diversity strategy
- Leading as visible role models, champions, advocates and representatives for QBE
- Overseeing adherence to this Policy and compliance with relevant laws
- Regularly monitoring the progress, impact and effectiveness of the strategy
- Through business updates, embedding the strategic importance of Inclusion of Diversity within our culture and for our customers by highlighting progress made and areas of ongoing focus both internally and externally
- Proactively identifying and monitoring any additional future areas of focus
- Facilitate annual reporting to the Group Board People & Remuneration Committee on status, implementation, progress and compliance.

The Committee will have regard to relevant provisions of the Women's Empowerment Principles, the ASX Corporate Governance Council's Principles and local EEO and anti-discrimination legislation in the jurisdictions in which QBE operates.

Responsibility for executing Inclusion of Diversity

Divisional
Leadership
Teams

Divisional Boards or the relevant Divisional Board committee are responsible for local adoption and implementation of this policy and the Inclusion of Diversity Strategy, supported by Divisional/Functional Leadership Teams.

The responsibility of the Leadership Teams will be the identification of core areas of focus to enable the QBE strategic business plan and build a workplace culture that is inclusive of diversity. These Leaders will act as visible role models, champions, advocates and representatives for QBE in addition to actively monitoring progress, impact and effectiveness of the Inclusion of Diversity Strategy in addition to any specific divisional goals. The Leadership Teams will also report to local Board Committees as required.

Managers and
Leaders

Leaders play a critical role in QBE achieving our aspiration for inclusion of diversity. Our [Global Leadership Attributes](#) define our expectations of all leaders underpinning our expectation of being visible role models, champions, advocates of inclusion and appropriate representatives for QBE.

Everyone

We all play a role in contributing to and building a respectful, inclusive and safe workplace culture. It's part of our QBE DNA. The Inclusion of Diversity Policy applies to everyone, regardless of your role or your seniority. It means everyone we interact with can expect to be treated fairly and respectfully, made to feel they are valued and safe to speak up.

How we take action and measure success

Key global focus areas have been identified to provide Group wide clarity and consistency in building a workplace culture that is inclusive of diversity. In some regions and divisions these are supplemented with specific local priorities. With accountability central to our success, we have globally consistent leadership attributes, reviewed as part of the annual performance management process. **At QBE, there are three key global focus areas with globally consistent initiatives and measures*:**

Diverse workforce

- **Diverse leadership representation:** Maintain positive progress against an aim of being representative of the communities in which we operate, with women in leadership targets set for leadership levels 0, 1, 2, and 3.
- **Build a diverse pipeline of talent:** Adhere to equitable policies and practices to govern the attraction, retention and development of our people. This is measured through the diverse representation of leaders, tracking participation at leadership and development programs and identification of diverse talent pools for promotion, hires and succession planning
- **Fair remuneration** – seek to reward our employees fairly and support our objective of gender pay equity through regular analysis, monitoring and transparent communication

Inclusive workplace

- **Inclusive leader capabilities:** Underpinned by the Global Leadership Attributes we will support the enablement of inclusive teams, Hybrid Working enabled by the Flex@QBE principles and the wellbeing and engagement of our people. Central to our success is a globally consistent approach to assessing leaders and the actions they take to support an inclusive workplace culture.
- **QBE DNA:** We are all responsible for the role we play in contributing to an inclusive culture, including living the QBE DNA, completion of relevant mandatory diversity and inclusion training and adherence to relevant policies and workplace standards.
- **Voice of Employee:** We are committed to listening to, and acting on, employee feedback measured through employee engagement and inclusion through a global inclusion measurement approach. Analysis of employee turnover and exit interviews also support the identification of future areas of focus enabling greater inclusion of diversity.
- **Flex@QBE:** At QBE, work is a thing we do, not a place we go. The Flex@QBE principles have been designed to empower our people, and support the needs of our customers and business. Business performance remains a key focus, balanced by a recognition that ways of working have changed.
- **Workplace wellbeing:** QBE is committed to supporting holistic health and wellbeing initiatives for our people, including mental, physical, social and financial wellbeing, in addition to the requirement to fulfil our duty of care in relation to workplace safety.

Connected marketplace

- **Customer satisfaction and retention:** Regularly review products, policies and practices to enhance equitable access for our diverse customer base
- **Vulnerable customers:** Our customers reflect the communities in which we operate globally, through the different stages of their lives, including in their greatest times of need. We are committed to ensuring we continually review products, policies and practices to enhance our response to customers experiencing hardship.
- **Diversity in supply chain:** We seek to engage with suppliers and partners who share our commitment to Inclusion of Diversity. We expect all suppliers and partners to adhere to global minimum standards related to inclusion of diversity

*Global focus areas, initiatives and measures are supplemented by specific Divisional/Functional focus areas, initiatives and measures aligned with local business goals.

How we ensure our legal compliance 1/2

Although regulatory requirements may vary across the jurisdictions in which QBE operates, each Division must ensure that systems and controls are in place to adhere to this Policy and comply with local regulatory requirements. Where local regulatory requirements materially conflict with this Policy, then local requirements must be complied with and the Group Chief Human Resources Officer (CHRO) must be notified of any conflict(s).

In particular, each Division must have this Policy approved by the relevant Divisional People & Remuneration Committee and accountability for application of this Policy sits with senior management.

This Policy should be read in conjunction with other QBE policies and guidelines that define and support our commitment to expected behaviours and conduct of employees and leaders. These include (but are not limited to):



[QBE Group Code of Ethics and Conduct](#)

Our Group Code of Ethics and Conduct addresses the responsibilities we all have at QBE to our company, to each other and to our customers, suppliers, communities and governments. It provides clear guidance to help us to make good judgement calls. It sets out specific expectations and beliefs for diversity and inclusion and includes a link to this policy.



[Group Whistleblowing Policy](#)

Creating an environment that is open, safe and transparent is integral to Inclusion of Diversity. The Group Whistleblowing Policy sets out QBE's minimum standards in encouraging and supporting employees, contractors, and directors in reporting misconduct and other illegal or inappropriate behaviours.



[Group Work, Health and Safety Policy](#)

Providing a safe and healthy environment for all workers and visitors is fundamental to Inclusion of Diversity. This policy sets global minimum standards essential for managing compliance with work, health and safety laws and requirements.



[Group Flexible Work Principles](#)

Providing all people with flexibility in their work is essential to the first step of inclusion – fairness and respect. The Flex@QBE principles ensure all employees are provided equal access and support of flexibility in terms of location, time, tools, dress, thinking and benefits.



[QBE Supplier Sustainability Principles](#)

The QBE supplier sustainability principles are aligned with one of three core Inclusion of Diversity Principles, “to be a positive influence for societal change”. These principles set out QBE's minimum expectations of all suppliers doing business with QBE, which includes workplace diversity and inclusion.



[QBE Leadership Attributes](#)

Playing an active role as inclusive leaders is a core to QBE achieving our Inclusion of Diversity aspirations and goals. The QBE Leadership Attributes set out how we achieve this through both how we show up as leaders and how we make an impact.

Continued next page

How we ensure our legal compliance 2/2



[Modern Slavery and Human Trafficking Statement](#)

This statement describes the steps that QBE has taken to address modern slavery and human trafficking risk across the Group and our global supply chains and sets out our plans for future improvements. Ensuring that all businesses throughout the QBE supply chain comply with laws related to human rights and are free from modern slavery and human trafficking is a foundational step in ensuring we uphold our inclusion of diversity principles



[Group Human Rights Policy](#)

This Policy provides an overview of the principles QBE adopts in relation to managing human rights, the requirements to integrate human rights considerations into all our business operations and the roles and responsibilities for different business units.



Consequence Management Policy

Under development



[Equal Employment Opportunity \(EEO\) Policies](#)

as they apply in each Division or country. Compliance with local regulations and laws pertaining to equal employment opportunity sets the foundation for Inclusion of Diversity. Each QBE Division has an equal employment opportunity policy that sets out minimum standards to ensure all workers are treated fairly and on merit without regard to criteria unrelated to performance, such as race, sex, age, marital status or other attributes covered by the specific regulatory requirements pertaining to the local jurisdiction.



Divisional D&I Policies and Strategies which support implementation of this global policy, where required. Each QBE Division is responsible for adopting and implementing the Group Inclusion of Diversity policy, which may be supplemented at the local level to set out how the global aspirations and goals for Inclusion of Diversity will be brought to life in a way that meets the local conditions and requirements.